

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HENRIETTA KLEIN, derivatively, on behalf of
PFIZER INC.,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.
ANTHONY BURNS, ROBERT N. BURT; W. DON
CORNWELL, WILLIAM H. GRAY III,
CONSTANCE J. HORNER, JAMES M. KILTS,
JEFFREY B. KINDLER, GEORGE A. LORCH,
DANA G. MEAD, SUZANNE NORA JOHNSON;
STEPHEN W. SANGER; WILLIAM C. STEERE,
JR., FREDA C. LEWIS-HALL, FRANK A.
D'AMELIO, and IAN READ,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

C.A. No. 09-cv-7822-JSR

ECF CASE

[caption continues on the following page]

**NOTICE OF MOTION OF AMALGAMATED BANK, AS TRUSTEE FOR
LONGVIEW LARGEINDEX VEBA FUND, LONGVIEW LARGEINDEX
500 INDEX FUND AND LONGVIEW QUANTITATIVE LARGEINDEX FUND, FOR
APPOINTMENT OF LEAD PLAINTIFF AND LEAD COUNSEL AND
CONSOLIDATION OF RELATED ACTIONS**

JAMES KENNEY, derivatively, on behalf of
PFIZER INC.,

C.A. No. 09-cv-7913-JSR

Plaintiff,

ECF CASE

v.

JEFFREY B. KINDLER, DOUGLAS M. LANKLER,
DENNIS A. AUSIELLO, MICHAEL S. BROWN,
ROBERT N. BURT, W. DON CORNWELL,
CONSTANCE J. HORNER, JAMES M. KILTS, DANA
G. MEAD; SUZANNE NORA JOHNSON, HENRY A.
MCKINNELL, DAVID L. SHEDLARZ, WILLIAM R.
HOWELL, STANLEY O. IKENBERRY, FRANKLIN
D. RAINES, RUTH J. SIMMONS, and JEAN PAUL
VALLES,

Defendants,

and

PFIZER INC., a Delaware corporation,

Nominal Defendant.

ROBERT J. CASEY and WILLIAM A.
HOUSTON, derivatively, on behalf of PFIZER
INC.,

Plaintiffs,
v.

DENNIS A. AUZIELLO, MICHAEL S. BROWN, M.
ANTHONY BURNS, ROBERT N. BURT, W. DON
CORNWELL, WILLIAM H. GRAY III, CONSTANCE
J. HORNER, JAMES M. KILTS, JEFFREY B.
KINDLER, GEORGE A. LORCH, DANA G. MEAD,
SUZANNE NORA JOHNSON, STEPHEN W.
SANGER, WILLIAM C. STEERE, JR., FREDA C.
LEWIS-HALL, FRANK A. D'AMELIO and IAN C.
READ,

Defendants,
and

PFIZER INC., a Delaware corporation,

C.A. No. 09-cv-7983-JSR

ECF CASE

Nominal Defendant.

LOUISIANA SHERIFFS' PENSION AND RELIEF FUND, derivatively, on behalf of PFIZER INC.,

C.A. No. 09-cv-8042-JSR

Plaintiff,

ECF CASE

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M. ANTHONY BURNS, ROBERT N. BURT, W. DON CORNWELL, WILLIAM H. GRAY III, CONSTANCE J. HORNER, JAMES M. KILTS, JEFFREY B. KINDLER, GEORGE A. LORCH, DANA G. MEAD, SUZANNE NORA JOHNSON, WILLIAM C. STEERE, JR., DOUGLAS M. LANKLER, FRANK. A. D'AMELIO, IAN C. READ, and JOSEPH M. FECZKO,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

CATHY BUCH,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.
ANTHONY BURNS, ROBERT N. BURT, W. DON
CORNWELL, WILLIAM H. GRAY III, CONSTANCE
J. HORNER, JAMES M. KILTS, JEFFREY B.
KINDLER, GEORGE A. LORCH, DANA G. MEAD,
SUZANNE NORA JOHNSON, STEPHEN W.
SANGER, WILLIAM C. STEERE, JR., DOUGLAS
M. LANKLER, FRANK A. D'AMELIO, IAN C.
READ, JOSEPH M. FECZKO, HENRY A.
MCKINNELL, DAVID L. SHEDLARZ, WILLIAM R.
HOWELLSTANLEY O. IKENBERRY, FRANKLIN D.
RAINES, RUTH J. SIMMONS, JEAN-PAUL
VALLES, FREDA C. LEWIS-HALL, and PFIZER
INC.,

Defendants.

C.A. No. 09-cv-8289-JSR

ECF CASE

AMALGAMATED BANK, AS TRUSTEE FOR
LONGVIEW LARGE CAP 500 INDEX VEBA
FUND, LONGVIEW LARGE CAP 500 INDEX
FUND and LONGVIEW QUANTITATIVE
LARGE CAP FUND, derivatively, on behalf of
PFIZER INC.,

C.A. No. 09-cv-8363-JSR

ECF CASE

Plaintiff,

v.

DENNIS A. AUSSIAGO, MICHAEL S. BROWN, M.
ANTHONY BURNS, ROBERT N. BURT, W. DON
CORNWELL, WILLIAM H. GRAY III, CONSTANCE
J. HORNER, JAMES M. KILTS, JEFFREY B.
KINDLER, GEORGE A. LORCH, DANA G. MEAD,
SUZANNE NORA JOHNSON, WILLIAM C.
STEERE, JR., WILLIAM R. HOWELL, HENRY A.
MCKINNELL, STANLEY O. IKENBERRY, RUTH J.
SIMMONS, DOUGLAS M. LANKLER, FRANK A.
D'AMELIO, IAN C. READ, and JOSEPH M.
FECZKO,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

THE PORT AUTHORITY OF ALLEGHENY
COUNTY RETIREMENT AND DISABILITY
ALLOWANCE PLAN FOR EMPLOYEES
REPRESENTED BY LOCAL 85 OF
AMALGAMTED TRANSIT UNION,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.
ANTHONY BURNS, ROBERT N. BURT, W. DON
CORNWELL, WILLIAM H. GRAY III, CONSTANCE
J. HORNER, JAMES M. KILTS, JEFFREY B.
KINDLER, GEORGE A. LORCH, DANA G. MEAD,
SUZANNE NORA JOHNSON, STEPHEN W.
SANGER, WILLIAM C. STEERE, JR., DOUGLAS
M. LANKLER, FRANK A. D'AMELIO, IAN C.
READ, JOSEPH M. FECZKO, HENRY A.
MCKINNELL, DAVID L. SHEDLARZ, WILLIAM R.
HOWELL, STANLEY O. IKENBERRY, FRANKLIN
D. RAINES, RUTH J. SIMMONS, JEAN-PAUL
VALLES, FREDA C. LEWIS-HALL and PFIZER
INC.,

Defendants.

C.A. No. 09-cv-8388-JSR

ECF CASE

SKANDIA LIFE INSURANCE COMPANY LTD.,

Plaintiff,

v.

JEFFREY B. KINDLER, DENNIS A. AUSIELLO,
MICHAEL S. BROWN, M. ANTHONY BURNS,
ROBERT N. BURT, W. DON CORNWELL,
WILLIAM H. GRAY III, CONSTANCE J. HORNER,
WILLIAM R. HOWELL, STANLEY O. IKENBERRY,
SUZANNE NORA JOHNSON, JAMES M. KILTS,
GEORGE A. LORCH, HENRY A. MCKINNELL,
DANA G. MEAD, FRANKLIN D. RAINES, DAVID L.
SHEDLARZ, RUTH J. SIMMONS, WILLIAM C.
STEERE, JR., JEAN-PAUL VALLES, FRANK A.
D'AMELIO, JOSEPH M. FECZKO, DOUGLAS M.
LANKLER, and IAN C. READ,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

C.A. No. 09-cv-8544-UA

ECF CASE

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, before the Honorable Jed S. Rakoff, at the United States District Court for the Southern District of New York, located at the United States Courthouse, 500 Pearl Street, Courtroom 14B, New York, New York, Amalgamated Bank, as Trustee for LongView Largecap 500 Index VEBA Fund, LongView Largecap 500 Index Fund and LongView Quantitative Largecap Fund (“Amalgamated”), will respectfully move this Court, for entry of an Order (i) appointing Amalgamated as Lead Plaintiff in the above-captioned actions, (ii) appointing its counsel, Bernstein Litowitz Berger & Grossmann LLP, as Lead Counsel, and (iii) consolidating all above-captioned derivative actions against current and former members of senior management and the Board of Directors of Pfizer Inc. (“Pfizer” or the “Company”) under Rule 42(a) of the Federal Rules of Civil Procedure.

Amalgamated respectfully submits that the above-captioned actions—which allege similar claims based on nearly identical conduct by current and former members of senior management and the Board of Directors of Pfizer—and any subsequently filed or transferred actions brought on behalf of nominal defendant Pfizer that arise out of the same or similar facts, should be consolidated pursuant to Rule 42(a) of the Federal Rules of Civil Procedure. Further, Amalgamated respectfully requests that it be appointed as Lead Plaintiff and its counsel, Bernstein Litowitz Berger & Grossmann LLP, appointed as Lead Counsel because they are best qualified to represent the interests of the Company in the consolidated action.

This motion is based upon this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Declaration of Gerald H. Silk filed herewith,

the pleadings and other files herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Amalgamated respectfully requests that the Court (i) consolidate all related derivative actions; (ii) appoint Amalgamated as Lead Plaintiff; (iii) appoint Amalgamated's counsel, Bernstein Litowitz Berger & Grossmann LLP, as Lead Counsel; and (iv) grant such other and further relief as the Court may deem just and proper.

Dated: October 8, 2009

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

/s/ Gerald H. Silk

Gerald H. Silk
Mark Lebovitch
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for LongView Largecap 500 Index VEBA
Fund, LongView Largecap 500 Index Fund
and LongView Quantitative Largecap Fund*